

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,

Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**CITY OF DETROIT’S REPLY IN REGARD TO ITS  
OBJECTION TO CLAIM NUMBER 1075**

The City of Detroit, Michigan (“City”) files its *City of Detroit’s Reply in Regard to its Objection to Claim Number 1075* (the “Objection”).

On October 13, 2016, the City filed the *City of Detroit’s Objection to Claim Number 1075* (“Objection,” Doc. No. 11623). In the Objection, the City asserted that claim number 1075 (“Claim 1075”), filed by General Shale Brick Co. (“GSB”), incorrectly asserted that the City owed GSB money directly. Instead, GSB asserts rights in claim number 201 (“Claim 201”) filed by Michael Beydoun. As such, the City asserted that Claim 1075 should be disallowed and expunged and GSB should be awarded a claim in whatever amount(s) the Court should determine after it heard and resolved the *City of Detroit’s Motion to Determine Rights to Claim Number 201* (“Motion,” Doc. No. 11624).

Also on October 13, the City filed its Motion, where it proposed to allow GSB a claim for \$20,000 in cash and a Class 14 Other Unsecured Claim in the amount of \$7,271.94. By this claim allowance (and others), the City proposed to partition up Claim 201 among those asserting an interest in it.

On October 27, GSB filed its *Response to City of Detroit's Objection to Claim No. 1075* ("Response," Doc. No. 11646). In its Response, GSB asserts that its garnishment does provide a basis for a direct claim against the City. Otherwise, however, "GSB generally concurs in the City's proposed distribution of Claim 201 as set forth in the Motion." Response, p. 2.

As a practical matter, the City acknowledges that it is only a matter of semantics as to whether Claim 1075 is disallowed and a new claim allowed in its place or Claim 1075 is modified as proposed in the Motion. Thus, the City proposes that Claim 1075 be allowed in the amounts discussed in the Motion, namely as a claim for \$20,000 in cash and an allowed Class 14 Other Unsecured Claim in the amount of \$7,271.94.

November 10, 2016

Respectfully submitted,

By: /s/ Marc N. Swanson

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 10, 2016, he caused a copy of the *City of Detroit's Reply in Regard to its Objection to Claim Number 1075* to be served on all parties registered for ECF service and by first class mail to the following parties:

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